

Office of the Inspector General

January 31, 2000

William A. Halter
Deputy Commissioner
of Social Security

Inspector General

Management Advisory Report – The Social Security Administration's Warning Banner Implementation (A-13-98-12041)

Attached is a copy of the subject Management Advisory Report. The objectives of this review were to determine the extent of the implementation of the Social Security Administration's (SSA) warning banner on its local area networks and to determine whether the banner language implemented was the same language drafted and approved by SSA and the Office of the Counsel to the Inspector General.

You may wish to comment on any further action taken or contemplated on our recommendations. If you choose to comment, please provide your comments within 60 days of the date of this memorandum. If you wish to discuss the final report, please call me or have your staff contact Steven L. Schaeffer, Acting Assistant Inspector General for Audit, at (410) 965-9700.

James G. Huse, Jr.

Attachment

**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**THE SOCIAL SECURITY
ADMINISTRATION'S
WARNING BANNER
IMPLEMENTATION**

February 2000

A-13-98-12041

**MANAGEMENT
ADVISORY REPORT**



Office of the Inspector General

William A. Halter
Deputy Commissioner
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Management Advisory Report – The Social Security Administration’s Warning Banner Implementation (A-13-98-12041)

OBJECTIVE

The objectives of this review were to determine the extent of the implementation of Social Security Administration’s (SSA) warning banner on its local area networks (LAN) and to determine whether the banner language implemented was the same language drafted and approved by SSA and the Office of the Counsel to the Inspector General (OCIG).

BACKGROUND

As a user accesses (logs on) an SSA LAN, SSA’s warning banner is accessed first and processing stops. The user must press the banner “OK” button to enter the SSA LAN logon screen.¹ This action is an acknowledgement of the banner and its contents.

The warning banner drafted and approved by SSA and OCIG is as follows.

This is a U.S. Government computer system subject to Federal law. The Social Security Administration is an agency of the U.S. Federal Government. SSA’s network and all nodes attached are provided as a service to its employees and authorized contractors. There is no expectation of user privacy in the system including, but not limited to, electronic mail messages. Unauthorized attempts to access, upload, or otherwise alter data, programming language, or any other part of SSA’s systems are strictly prohibited and are subject to disciplinary and/or civil action or criminal prosecution. Anyone using this system expressly

¹ The screen where users enter their identification and password to gain entry into SSA’s LAN.

consents to monitoring and is advised that if such monitoring reveals possible evidence of criminal activity, SSA may provide the evidence of such monitoring to law enforcement officials.

SSA's warning banner is a security tool that deters fraud and abuse of SSA's systems because it informs an employee or hacker that unauthorized access to an SSA system can be subject to disciplinary or civil action or criminal prosecution. The banner also serves as a law enforcement tool because it makes it clear to employees that unauthorized use of SSA computers is prohibited.

The banner does not address every computer security-related issue. Instead, it works with other SSA policies, procedures, and security measures, including those concerning the use of Government property and privacy in the workplace. For example, the SSA warning banner does not state that its computers are to be used for official SSA activities. Conversely, chapter 14, *Microcomputer Security*, of the SSA Systems Security Handbook emphasizes the official use of SSA computers in bold print.

We performed this review at the Office of the Inspector General's (OIG) Office of Investigations' (OI) request after it identified a desktop computer that did not show SSA's warning banner when the user accessed an SSA LAN. SSA's warning banner facilitates search and seizure efforts by informing employees that there is no expectation of user privacy in SSA systems. The warning banner makes clear to all parties the rules governing the use of SSA's automated information systems.

After discussing the OI request with OCIG, we determined that this review should also follow up on the OCIG's June 23, 1997, OIG Regulatory Commentary, *Social Security Administration Computer Warning Banner*. The Commentary concluded that SSA should institute a computer warning banner that will serve as both a deterrent against unauthorized computer intrusions and a weapon in the Agency's efforts to combat employee fraud. In a July 30, 1997, memorandum, the Commissioner of SSA agreed that SSA should have an Agency-wide computer warning banner on each internal computer. The Commissioner stated that the warning banner would be added to the individual computers as they are transferred to the SSA Windows New Technology (NT) environment² within the next 12 months (July 30, 1998).

SSA and OCIG drafted and approved the warning banner language. Once the language was approved, the Office of Telecommunications and Systems Operations (OTSO) began implementing SSA's warning banner as the individual computers were transferred to the SSA Windows NT environment. In September 1998, OTSO informed us that the transfer of all computers and LANs to an SSA Windows NT environment

² The SSA Windows NT environment is a LAN maintained and controlled by OTSO.

was ongoing and was planned for completion by September 30, 1999. SSA estimated that 2,825 LANs with 59,095 computers were operating on the SSA Windows NT environment, and at least 300 LANs needed to be transferred. In September 1999, SSA informed us that it needed to transfer 4,164 (5 percent) of its 77,430 devices³ to the Windows NT environment.

SCOPE AND METHODOLOGY

We limited the scope of this review to the warning banner used with Agency LANs. We visited 19 offices and observed whether the warning banner and acknowledgement were displayed as users accessed SSA LANs. Those offices included the Office of Hearings and Appeals (OHA) and offices located at SSA Headquarters and its regions. We interviewed personnel within the Office of General Counsel, Office of Financial Policy and Operations (OFPO), Division of Systems Security (DSS), and the Office of Systems to ascertain the number and types of SSA LANs and to verify whether the warning banner implemented was the banner approved by SSA and OCIG. We performed this review from July through November 1998. In September 1999, we obtained the status of the banner implementation.

RESULTS OF REVIEW

SSA made significant accomplishments with the implementation of its warning banner, which is displayed on the estimated 59,095 computers accessing 2,825 LANs. However, SSA did not complete the transfer of individual computers to the SSA Windows NT environment by July 30, 1998, as planned. SSA extended this date to September 30, 1999. As a result, implementation of SSA's warning banner is incomplete for those computers connected to the remaining 300 LANs to be transferred. Also, the warning banner language was not the approved language.

Implementation of the Banner Needs to Be Completed

SSA believed most of the 300 LANs lacking banners were located at SSA Headquarters and few remain in SSA's regions. SSA could not provide documentation to support the accuracy of the 300-LAN estimate or to show how many computers were connected to those LANs. SSA also could not provide an implementation plan showing the resource allocation and timing for the transfer of the 300 LANs to the SSA Windows NT environment by September 30, 1999, a planned project delay from the July 30, 1998, completion. At the time of our review, we believed the warning banner may not be fully implemented on all SSA LANs by the end of FY 1999 because the 300-LAN estimate may not be accurate, and there is a lack of planning documentation for the implementation of those LANs.

³ SSA defines devices as a mix of network components such as printers, computers, and LAN servers.

We judgmentally selected 19 offices throughout SSA to determine whether the warning banner and acknowledgement were displayed as users accessed SSA LANs. We confirmed that computers connected to the SSA Windows NT environment displayed the banner and its acknowledgement, and those computers not connected to the Windows NT environment did not display the banner and its acknowledgement. Specifically, we found that the banner and its acknowledgement were displayed on 10 computers connected to the SSA Windows NT environment. Likewise, we found that nine computers not connected to the SSA Windows NT environment did not display the banner and its acknowledgement and those computers access sensitive information such as disability information maintained by OHA. One significant Headquarters office that did not display the banner on its computer was the OFPO, DSS. Appendix A lists the offices and their components whose computers did not display the banner and its acknowledgement.

Planned project delays and potential unplanned delays resulted in the warning banner not being implemented timely. As a result, SSA did not take necessary steps to reduce fraud and abuse. We believe the warning banner implementation should no longer be associated with the transfer of individual computers to the SSA Windows NT environment. Rather, the warning banner should be implemented on all SSA LANs, regardless of the scheduled transfer to the SSA Windows NT environment.

In September 1999, SSA informed us that 73,266 of its 77,430 devices were transferred to the SSA Windows NT environment. SSA could not provide the number of computers and LANs included in the 77,430 devices. Because the transfer to the Windows NT environment is ongoing, implementation of SSA's warning banner is incomplete for the number of computers and LANs within the 4,164 (77,430 less 73,266) remaining devices.

Only the Approved Warning Banner Language Should Be Used

The warning banner displayed on 59,095 computers accessing the SSA Windows NT environment did not agree with the banner drafted and approved by SSA and OCIG. The Department of Justice (DoJ) Computer Crime Unit also reviewed and approved the SSA/OCIG approved warning banner. The DoJ approval was critical to ensuring the banner was acceptable for law enforcement purposes. After the approvals, SSA altered the banner language, but it could not explain when or why the language was altered.

Text from the implemented warning banner was either omitted or changed. For example, SSA omitted the word "access" as a type of activity that is prohibited. The word "access" should be included in the banner because SSA LANs can be accessed and sensitive information can be viewed without alteration. Also, the addition of the

word “access” on the banner is needed for employee investigations because it makes it clear to employees that unauthorized use of SSA computers is prohibited. As a result of such omissions, we believe SSA’s warning banner is less effective as a tool to deter fraud and abuse of SSA systems. Also, the prosecution for unauthorized access could be impeded because an employee can now deny knowledge of wrongdoing. Appendix B shows the warning banner language used by SSA, and the SSA/OCIG approved banner language with the omitted or changed language in bold print.

In the July 30, 1997, response to the OIG Commentary, the Commissioner of SSA stated that the warning banner would be added to the individual computers within the next 12 months. DSS staff did not confirm that the Office of Systems implemented the SSA/OCIG approved warning banner by July 30, 1998. The *Systems Security Handbook* states that the SSA Systems Security Officer has overall responsibility for security policy, procedures, and standards for SSA LANs and individual computers. It also states, “The SSA Systems Security Officer is responsible for monitoring system security to ensure Agency compliance with established policy.”

CONCLUSION AND RECOMMENDATIONS

SSA implemented the warning banner as it transferred individual computers to the SSA Windows NT environment. However, that banner was not the SSA/OCIG approved banner. Also, because LANs within the 4,164 devices need to be transferred to the SSA Windows NT environment, the warning banner implementation is incomplete. The DSS should have ensured that the SSA/OCIG approved warning banner was fully implemented.

We recommend that SSA:

1. Direct DSS to follow SSA’s security policy and monitor the implementation of the approved warning banner to ensure its completion in a timely manner;
2. Direct DSS to follow SSA’s security policy and monitor the continued Agency-wide use of the warning banner as a security objective; and
3. Implement the SSA/OCIG approved warning banner by the end of Calendar Year 1999 on all SSA LANs to deter fraud and abuse of computers accessing SSA LANs and assist with any investigations involving those computers.

AGENCY COMMENTS AND OIG RESPONSE

SSA agreed with our recommendations. It stated that the Office of Systems Security (formerly Division of Systems Security) is monitoring the implementation of the approved banner to be completed with the transfer of devices to the SSA Windows NT environment by the end of spring 2000. SSA LANs have been updated with the approved language. We believe that SSA's proactive actions in response to this report demonstrate its commitment to an aggressive systems security program.

James G. Huse, Jr.

APPENDICES

Social Security Administration Offices Not Observing and Acknowledging Warning Banner

Computers in nine offices from eight Social Security Administration (SSA) components did not display SSA's warning banner and its acknowledgement. Eight of the offices were located at SSA Headquarters. SSA is taking an unnecessary risk of fraud and abuse for those computers and any others not displaying a warning banner with an acknowledgement.

| Deputy Commissioner | Office | SSA Location |
|---|--|---------------------|
| Communications | Office of Public Inquiries, Policy Procedures and Operations Support Group | Headquarters |
| Disability and Income Security Programs | Office of Hearings and Appeals | Falls Church Office |
| Finance, Assessment and Management | Office of Financial Policy and Operations, Division of Systems Security Office of Quality Assurance and Performance Assessment, Division of Data Management | Headquarters |
| Human Resources | Office of Labor Management and Employee Relations, Policy Integration Team | Headquarters |
| Legislation and Congressional Affairs | Supplemental Security Income Program Staff | Headquarters |
| Operations | Office of Telephone Services, Service Team | Headquarters |
| Policy | Office of Research, Evaluation and Statistics | Headquarters |
| Systems | Office of Systems Design and Development, Division of Data Systems | Headquarters |

Banner Language

The banner language used by the Social Security Administration (SSA) and the banner approved by SSA and the Office of the Counsel to the Inspector General (OCIG) are shown below. The omitted or changed text is shown in bold print on the SSA/OCIG approved banner.

Banner Being Used by SSA

The Social Security Administration is an agency of the U.S. Federal Government. SSA's network and all nodes attached are provided as a service to the employees and authorized contractors. There is no expectation of user privacy in this system including, but not limited to, electronic messages. Unauthorized attempts to upload or otherwise alter data, programming language, or any other part of SSA's system are strictly prohibited and are subject to disciplinary and/or civil action or criminal prosecution. Anyone using this system expressly consents to monitoring and is advised that if such monitoring reveals possible evidence of criminal activity, SSA may provide that evidence to law enforcement officials.

Banner Approved by SSA and the OCIG

This is a U.S. Government computer system subject to Federal law. The Social Security Administration is an agency of the U.S. Federal Government. SSA's network and all nodes attached are provided as a service to its employees and authorized contractors. There is no expectation of user privacy in the system including, but not limited to, electronic **mail** messages. Unauthorized attempts to **access**, upload, or otherwise alter data, programming language, or any other part of SSA's systems are strictly prohibited and are subject to disciplinary and/or civil action or criminal prosecution. Anyone using this system expressly consents to monitoring and is advised that if such monitoring reveals possible evidence of criminal activity, SSA may provide **the** evidence **of such monitoring** to law enforcement officials.

AGENCY COMMENTS

COMMENTS ON THE OFFICE OF INSPECTOR GENERAL (OIG) DRAFT
MANAGEMENT ADVISORY REPORT, "THE SOCIAL SECURITY ADMINISTRATION'S
WARNING BANNER IMPLEMENTATION"
(A-13-98-12041)

Thank you for the opportunity to review this draft report. We agree that use of an effective warning banner of the kind highlighted in this OIG report is an important component of our aggressive systems security program.

OIG Recommendations

Direct the Division of Systems Security (DSS) to follow the Social Security Administration's (SSA) security policy and monitor the implementation of the approved warning banner to ensure its completion in a timely manner.

Direct DSS to follow SSA's security policy and monitor the continued Agency-wide use of the warning banner as a security objective.

Comment

We agree. The Office of Systems Security (formerly named DSS) is monitoring the implementation of the approved banner now underway (see comment on following recommendation) and will continue to do so to help ensure the security of SSA data.

OIG Recommendation

Implement the SSA/Office of the Counsel to the Inspector General approved warning banner by the end of Calendar Year 1999 on all SSA local area networks (LAN) to deter fraud and abuse of computers accessing SSA LANs and assist with any investigations involving those computers.

Comment

We agree in the importance of timely implementation of the approved warning banner, and actions have been taken and are underway in this regard. The banners on all SSA LAN domain member servers have already been updated. As the

remaining legacy LANs and workstations are replaced with devices that conform to the present SSA LAN infrastructure, the users will receive the approved warning banner. We expect these remaining devices to be replaced by the end of Spring 2000. Should access concerns arise concerning those computers in the future, we agree to assist in investigations as needed.

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For additional copies of this report, please contact Office of the Inspector General's Public Affairs Specialist at (410) 966-5998. Refer to Common Identification Number A-13-98-12041.

SSA ORGANIZATIONAL CHART

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